

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CURLING PLAINTIFFS' MOTION FOR EXCESS PAGES

Pursuant to Local Rule 7.1(D), Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) move for fifteen (15) additional pages for their Opposition to State Defendants’ Motion for Clarification or Modification of this Court’s Order, [Doc. 1348] (the “Motion”). Under the Local Rules, the page limit for such briefs is twenty-five (25) pages. Curling Plaintiffs respectfully request leave to file a brief of no longer than forty (40) pages.

In support of this Motion, Curling Plaintiffs respectfully submit that the complexity in reconstructing an accurate timeline of many important events from the past year and a half; the volume of correspondence, discovery, case filings, and other materials material to the Motion and Curling Plaintiffs’ response; and the need to properly and fully respond to State Defendants’ misrepresentations and public

attack on the integrity of Curling Plaintiffs' counsel, this Court, and its former clerk necessitate more pages than an ordinary response motion. An additional 15 pages is needed to fully lay out the key facts and events of what actually occurred since December 2020 and to refute State Defendants' inaccurate narrative and arguments. A detailed and accurate recounting of relevant facts and events and statement of the law will aid the Court in reaching a fair and just resolution of State Defendants' Motion and are needed to correct the public record regarding the integrity of Curling Plaintiffs' counsel, this Court, and its former clerk.

A proposed order is attached hereto.

Dated: April 11, 2022

Respectfully submitted,

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2022, a copy of the foregoing **CURLING**
PLAINTIFFS' MOTION FOR EXCESS PAGES was electronically filed with
the Clerk of Court using the CM/ECF system, which will automatically send
notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross